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9 *Angie Santos*

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 KRISTINA KERLUS, individually,

Case No.: 2:24-cv-02352-APG-DJA

13 Plaintiff,
14 vs.

**DEFENDANT SANTOS' ANSWER TO
FIRST AMENDED COMPLAINT
[ECF No. 7]**

15 DR. JENNIFER CORNEAL, in her individual
capacity; A. SANTOS, in her individual
capacity; CITY OF LAS VEGAS, a Municipal
16 corporation; and COUNTY OF CLARK, a
Municipal corporation; LAS VEGAS
17 METROPOLITAN POLICE DEPARTMENT,
jointly and severally

18 Defendants.
19

20 Defendant Angie Santos ("LVMPD Defendant" or "Santos") for her Answer to Plaintiff's
21 First Amended Complaint, admits, denies and alleges as follows:

22 1. Answering Paragraph 1 of Plaintiff's Amended Complaint, Santos alleges that the
23 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
24 not required to answer the same.

1 2. Answering Paragraph 2 of Plaintiff's Amended Complaint, Santos alleges that the
2 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
3 not required to answer the same.

4 3. Answering Paragraph 3 of Plaintiff's Amended Complaint, Santos alleges that the
5 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
6 not required to answer the same.

7 4. Answering Paragraph 4 of Plaintiff's Amended Complaint, Santos alleges that the
8 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
9 not required to answer the same.

10 5. Answering Paragraph 5 of Plaintiff's Amended Complaint, Santos is without
11 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
12 said paragraph and therefore denies the same.

13 6. Answering Paragraph 6 of Plaintiff's First Amended Complaint, Santos admits that
14 her P number was 7200, she was employed as a detective with LVMPD, and was acting within the
15 scope of her employment. Santos denies that LVMPD is a department of Defendant Las Vegas.

16 7. Answering Paragraph 7 of Plaintiff's First Amended Complaint, Santos
17 affirmatively alleges that she was a sworn police officer with LVMPD and took an oath.

18 8. Answering Paragraph 8 of Plaintiff's Amended Complaint, Santos alleges that the
19 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
20 not required to answer the same.

21 9. Answering Paragraph 9 of Plaintiff's Amended Complaint, Santos alleges that the
22 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
23 not required to answer the same.

24 10. Answering Paragraph 10 of Plaintiff's First Amended Complaint, Santos admits

1 that LVMPD is a political subdivision of the State of Nevada. Santos denies that Corneal was an
2 employee of LVMPD. As to the remaining allegations in said Paragraph, Santos alleges that the
3 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
4 not required to answer the same.

5 11. Answering Paragraph 11 of Plaintiff's Amended Complaint, Santos is without
6 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
7 said paragraph and therefore denies the same.

8 12. Answering Paragraph 12 of Plaintiff's Amended Complaint, Santos is without
9 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
10 said paragraph and therefore denies the same.

11 13. Answering Paragraph 13 of Plaintiff's Amended Complaint, Santos is without
12 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
13 said paragraph and therefore denies the same.

14 14. Answering Paragraph 14 of Plaintiff's Amended Complaint, Santos is without
15 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
16 said paragraph and therefore denies the same.

17 15. Answering Paragraph 15 of Plaintiff's Amended Complaint, Santos is without
18 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
19 said paragraph and therefore denies the same.

20 16. Answering Paragraph 16 of Plaintiff's Amended Complaint, Santos is without
21 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
22 said paragraph and therefore denies the same.

23 17. Answering Paragraph 17 of Plaintiff's First Amended Complaint, the CT scan
24 speaks for itself.

1 18. Answering Paragraph 18 of Plaintiff's Amended Complaint, Santos admits the
2 allegations contained herein.

3 19. Answering Paragraph 19 of Plaintiff's Amended Complaint, Santos admits the
4 allegations contained herein.

5 20. Answering Paragraph 20 of Plaintiff's Amended Complaint, Santos admits the
6 allegations contained herein.

7 21. Answering Paragraph 21 of Plaintiff's Amended Complaint, Santos admits the
8 allegations contained herein.

9 22. Answering Paragraph 22 of Plaintiff's First Amended Complaint, Corneal's report
10 speaks for itself.

11 23. Answering Paragraph 23 of Plaintiff's Amended Complaint, Santos is without
12 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
13 said paragraph and therefore denies the same.

14 24. Answering Paragraph 24 of Plaintiff's Amended Complaint, Santos is without
15 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
16 said paragraph and therefore denies the same.

17 25. Answering Paragraph 25 of Plaintiff's First Amended Complaint, Corneal's report
18 speaks for itself.

19 26. Answering Paragraph 26 of Plaintiff's First Amended Complaint, Corneal's report
20 speaks for itself.

21 27. Answering Paragraph 27 of Plaintiff's First Amended Complaint, Corneal's report
22 speaks for itself.

23 28. Answering Paragraph 28 of Plaintiff's Amended Complaint, Santos is without
24 knowledge or information sufficient to form a belief as to the truth of the allegations contained in

1 said paragraph and therefore denies the same.

2 29. Answering Paragraph 29 of Plaintiff's Amended Complaint, Santos is without
3 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
4 said paragraph and therefore denies the same.

5 30. Answering Paragraph 30 of Plaintiff's Amended Complaint, Santos is without
6 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
7 said paragraph and therefore denies the same.

8 31. Answering Paragraph 31 of Plaintiff's Amended Complaint, Santos is without
9 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
10 said paragraph and therefore denies the same.

11 32. Answering Paragraph 32 of Plaintiff's Amended Complaint, Santos is without
12 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
13 said paragraph and therefore denies the same.

14 33. Answering Paragraph 33 of Plaintiff's Amended Complaint, Santos is without
15 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
16 said paragraph and therefore denies the same.

17 34. Answering Paragraph 34 of Plaintiff's Amended Complaint, Santos is without
18 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
19 said paragraph and therefore denies the same.

20 35. Answering Paragraph 35 of Plaintiff's Amended Complaint, Santos is without
21 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
22 said paragraph and therefore denies the same.

23 36. Answering Paragraph 36 of Plaintiff's Amended Complaint, Santos is without
24 knowledge or information sufficient to form a belief as to the truth of the allegations contained in

1 said paragraph and therefore denies the same.

2 37. Answering Paragraph 37 of Plaintiff's Amended Complaint, Santos is without
3 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
4 said paragraph and therefore denies the same.

5 38. Answering Paragraph 38 of Plaintiff's Amended Complaint, Santos is without
6 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
7 said paragraph and therefore denies the same.

8 39. Answering Paragraph 39 of Plaintiff's Amended Complaint, Santos admits the
9 allegations contained herein.

10 40. Answering Paragraph 40 of Plaintiff's Amended Complaint, Santos admits the
11 allegations contained herein.

12 41. Answering Paragraph 41 of Plaintiff's Amended Complaint, Santos denies the
13 allegations contained therein.

14 42. Answering Paragraph 42 of Plaintiff's Amended Complaint, Santos is without
15 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
16 said paragraph and therefore denies the same.

17 43. Answering Paragraph 43 of Plaintiff's Amended Complaint, Santos admits the
18 allegations contained herein.

19 44. Answering Paragraph 44 of Plaintiff's Amended Complaint, Santos is without
20 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
21 said paragraph and therefore denies the same.

22 45. Answering Paragraph 45 of Plaintiff's Amended Complaint, Santos is without
23 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
24 said paragraph and therefore denies the same.

1 46. Answering Paragraph 46 of Plaintiff's Amended Complaint, Santos is without
2 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
3 said paragraph and therefore denies the same.

4 47. Answering Paragraph 47 of Plaintiff's First Amended Complaint, Santos
5 affirmatively alleges that her report speaks for itself. Santos denies the allegations that the contents
6 of her report contained deliberate falsehoods.

7 48. Answering Paragraph 48 of Plaintiff's First Amended Complaint, Santos admits
8 she submitted a declaration of arrest report which speaks for itself. Santos denies the remainder
9 of said paragraph.

10 49. Answering Paragraph 49 of Plaintiff's Amended Complaint, Santos is without
11 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
12 said paragraph and therefore denies the same.

13 50. Answering Paragraph 50 of Plaintiff's Amended Complaint, Santos denies the
14 allegations contained herein.

15 51. Answering paragraph 51 of Plaintiff's First Amended Complaint, Matshes' report
16 speaks for itself.

17 52. Answering paragraph 52 of Plaintiff's First Amended Complaint, Corneal's
18 autopsy report speaks for itself.

19 53. Answering paragraph 53 of Plaintiff's First Amended Complaint, Matshes' report
20 speaks for itself.

21 54. Answering Paragraph 54 of Plaintiff's Amended Complaint, Santos is without
22 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
23 said paragraph and therefore denies the same.

24 55. Answering paragraph 55 of Plaintiff's First Amended Complaint, Shaller's report

1 speaks for itself.

2 56. Answering Paragraph 56 of Plaintiff's Amended Complaint, Santos is without
3 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
4 said paragraph and therefore denies the same.

5 57. Answering Paragraph 57 of Plaintiff's Amended Complaint, Santos alleges that the
6 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
7 not required to answer the same.

8 58. Answering Paragraph 58 of Plaintiff's Amended Complaint, Santos alleges that the
9 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
10 not required to answer the same.

11 59. Answering Paragraph 59 of Plaintiff's Amended Complaint, Santos denies the
12 allegations contained herein.

13 60. Answering Paragraph 60 of Plaintiff's Amended Complaint, Santos denies the
14 allegations contained herein.

15 61. Answering Paragraph 61 of Plaintiff's Amended Complaint, Santos repeats and
16 realleges her answers to the preceding paragraphs, inclusive, and incorporates the same by
17 reference as though fully set forth therein.

18 62. Answering Paragraph 62 of Plaintiff's Amended Complaint, Santos alleges that the
19 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
20 not required to answer the same.

21 63. Answering Paragraph 63 of Plaintiff's Amended Complaint, Santos is without
22 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
23 said paragraph and therefore denies the same.

24 64. Answering Paragraph 64 of Plaintiff's Amended Complaint, Santos is without

1 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
2 said paragraph and therefore denies the same.

3 65. Answering Paragraph 65 of Plaintiff's Amended Complaint, Santos repeats and
4 realleges her answers to the preceding paragraphs, inclusive, and incorporates the same by
5 reference as though fully set forth therein.

6 66. Answering Paragraph 66 of Plaintiff's Amended Complaint, Santos alleges that the
7 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
8 not required to answer the same.

9 67. Answering Paragraph 67 of Plaintiff's Amended Complaint, Santos is without
10 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
11 said paragraph and therefore denies the same.

12 68. Answering Paragraph 68 of Plaintiff's Amended Complaint, Santos denies the
13 allegations contained herein.

14 69. Answering Paragraph 69 of Plaintiff's Amended Complaint, Santos alleges that the
15 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
16 not required to answer the same.

17 70. Answering Paragraph 70 of Plaintiff's Amended Complaint, Santos repeats and
18 realleges her answers to the preceding paragraphs, inclusive, and incorporates the same by
19 reference as though fully set forth therein.

20 71. Answering Paragraph 71 of Plaintiff's Amended Complaint, Santos alleges that the
21 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
22 not required to answer the same.

23 72. Answering Paragraph 72 of Plaintiff's Amended Complaint, Santos denies the
24 allegations contained herein.

1 73. Answering Paragraph 73 of Plaintiff's Amended Complaint, Santos denies the
2 allegations contained herein.

3 74. Answering Paragraph 74 of Plaintiff's Amended Complaint, Santos alleges that the
4 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
5 not required to answer the same.

6 75. Answering Paragraph 75 of Plaintiff's Amended Complaint, Santos repeats and
7 realleges her answers to the preceding paragraphs, inclusive, and incorporates the same by
8 reference as though fully set forth therein.

9 76. Answering Paragraph 76 of Plaintiff's Amended Complaint, Santos is without
10 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
11 said paragraph and therefore denies the same.

12 77. Answering Paragraph 77 of Plaintiff's Amended Complaint, Santos is without
13 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
14 said paragraph and therefore denies the same.

15 78. Answering Paragraph 78 of Plaintiff's Amended Complaint, Santos is without
16 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
17 said paragraph and therefore denies the same.

18 79. Answering Paragraph 79 of Plaintiff's Amended Complaint, Santos is without
19 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
20 said paragraph and therefore denies the same.

21 80. Answering Paragraph 80 of Plaintiff's Amended Complaint, Santos is without
22 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
23 said paragraph and therefore denies the same.

24 81. Answering Paragraph 81 of Plaintiff's Amended Complaint, Santos alleges that the

1 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
2 not required to answer the same.

3 82. Answering Paragraph 82 of Plaintiff's Amended Complaint, Santos is without
4 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
5 said paragraph and therefore denies the same.

6 83. Answering Paragraph 83 of Plaintiff's Amended Complaint, Santos alleges that the
7 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
8 not required to answer the same.

9 84. Answering Paragraph 84 of Plaintiff's Amended Complaint, Santos alleges that the
10 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
11 not required to answer the same.

12 85. Answering Paragraph 85 of Plaintiff's Amended Complaint, Santos denies the
13 allegations contained herein.

14 86. Answering Paragraph 86 of Plaintiff's Amended Complaint, Santos repeats and
15 realleges her answers to the preceding paragraphs, inclusive, and incorporates the same by
16 reference as though fully set forth therein.

17 87. Answering Paragraph 87 of Plaintiff's Amended Complaint, Santos is without
18 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
19 said paragraph and therefore denies the same.

20 88. Answering Paragraph 88 of Plaintiff's First Amended Complaint, Santos
21 affirmatively alleges that she was not employed by Defendant Las Vegas and, as such, would not
22 have received employee training from it.

23 89. Answering Paragraph 89 of Plaintiff's Amended Complaint, Santos is without
24 knowledge or information sufficient to form a belief as to the truth of the allegations contained in

1 said paragraph and therefore denies the same.

2 90. Answering Paragraph 90 of Plaintiff's First Amended Complaint, Santos
3 affirmatively alleges that evaluating evidence to determine if probable cause supports a declaration
4 of warrant was a regular function of her employment as a detective at LVMPD.

5 91. Answering Paragraph 91 of Plaintiff's Amended Complaint, Santos alleges that the
6 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
7 not required to answer the same.

8 92. Answering Paragraph 92 of Plaintiff's Amended Complaint, Santos denies the
9 allegations contained herein.

10 93. Answering Paragraph 93 of Plaintiff's Amended Complaint, Santos alleges that the
11 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
12 not required to answer the same.

13 94. Answering Paragraph 94 of Plaintiff's Amended Complaint, Santos alleges that the
14 allegations contained therein call for non-factual, legal conclusions and the Defendant is therefore
15 not required to answer the same.

16 95. Answering Paragraph 95 of Plaintiff's Amended Complaint, Santos denies the
17 allegations contained herein.

18 96. Answering Paragraph 96 of Plaintiff's Amended Complaint, Santos repeats and
19 realleges her answers to the preceding paragraphs, inclusive, and incorporates the same by
20 reference as though fully set forth therein.

21 97. Answering Paragraph 97 of Plaintiff's Amended Complaint, Santos denies the
22 allegations contained herein.

23 98. Answering Paragraph 98 of Plaintiff's Amended Complaint, Santos denies the
24 allegations contained herein.

1 99. Answering Paragraph 99 of Plaintiff's Amended Complaint, Santos is without
2 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
3 said paragraph and therefore denies the same.

4 100. Answering Paragraph 100 of Plaintiff's First Amended Complaint, Santos
5 affirmatively alleges that evaluating evidence to determine if probable cause supports a declaration
6 of warrant was a regular function of her employment as a detective at LVMPD.

7 101. Answering Paragraph 101 of Plaintiff's Amended Complaint, Santos denies the
8 allegations contained herein.

9 102. Answering Paragraph 102 of Plaintiff's Amended Complaint, Santos denies the
10 allegations contained herein.

11 103. Answering Paragraph 103 of Plaintiff's Amended Complaint, Santos denies the
12 allegations contained herein.

13 104. Answering Paragraph 104 of Plaintiff's Amended Complaint, Santos denies the
14 allegations contained herein.

15 105. Answering Paragraph 105 of Plaintiff's Amended Complaint, Santos denies the
16 allegations contained herein.

17 106. Answering Paragraph 106 of Plaintiff's Amended Complaint, Santos repeats and
18 realleges her answers to the preceding paragraphs, inclusive, and incorporates the same by
19 reference as though fully set forth therein.

20 107. Answering Paragraph 107 of Plaintiff's Amended Complaint, Santos alleges that
21 the allegations contained therein call for non-factual, legal conclusions and the Defendant is
22 therefore not required to answer the same.

23 108. Answering Paragraph 108 of Plaintiff's Amended Complaint, Santos denies the
24 allegations contained herein.

110. Answering the Prayer for Damages of Plaintiff's First Amended Complaint, Santos
denies the allegations contained herein.

6 Further, as affirmative defenses to each and all of Plaintiff's alleged "causes of action,"
7 Santos alleges:

1. Plaintiff's First Amended Complaint on file herein fails to state a claim against Santos upon which relief can be granted.

0 2. Some or all of the Plaintiff's claims are barred by the statute of limitations and the
1 claims notice statute.

2 3. Santos' actions were reasonable and justified under the circumstances and were
3 privileged.

4 4. At all times mentioned in Plaintiff's First Amended Complaint, Santos acted under
5 the good faith belief that her actions were legally justifiable.

5. The arrest, identification and imprisonment of Plaintiff, was completely justified and privileged under the circumstances alleged and was perfected pursuant to probable cause and reasonable cause in believing the Plaintiff had committed a criminal act.

9 6. There can be no recovery for punitive damages against any government official
10 acting in his or her official capacity, pursuant to 42 U.S.C. § 1983.

7. No award of punitive damages can be awarded against Santos under the facts and circumstances alleged in Plaintiff's First Amended Complaint.

8. Plaintiff's claims are subject to the doctrines of waiver and/or estoppel.

9. At all times mentioned in Plaintiff's First Amended Complaint, Santos did not

1 personally participate in any of the Plaintiff's alleged violations of her constitutional rights.

2 10. To the extent Plaintiff's causes of actions against Santos sound in negligence, no
3 recovery can be had predicated upon 42 USC § 1983.

4 11. Plaintiff's suit fails to state claim for relief as she fails to allege a violation of right,
5 privilege, or immunity secured by the United States Constitution or by the laws of the United
6 States.

7 12. Santos is qualifiedly immune from the actions alleged against them in Plaintiff's
8 First Amended Complaint.

9 13. The Nevada Revised Statutes, chapter 41, limit the damages that may be collectable
10 against a political subdivision of the State of Nevada and its employees.

11 14. Santos is not subject to suit upon the facts and conclusions as stated in Plaintiff's
12 First Amended Complaint by reason of LVMPD's sovereign immunity as a political subdivision
13 of the State of Nevada and more particularly by reason of the provisions of NRS 41.031, 41.032,
14 41.033.

15 15. Plaintiff's First Amended Complaint concerns a discretionary function of Santos'
16 employment for which Santos is immune.

17 16. Plaintiff's claims of a constitutional violation are unsupported in both fact and law,
18 as Plaintiff has not alleged sufficient basis from which a constitutional interest might arise in
19 conjunction with the alleged actions.

20 17. The district attorney and the Court made independent determinations of probable
21 cause and therefore there is an intervening or superseding cause.

22 18. Santos engaged in no conduct shocking to the conscience to be held liable for a
23 substantive due process violation.

24 19. Santos acted at all pertinent times in accordance with applicable state and federal

1 laws, and under legal authority.

2 20. Santos' conduct did not violate clearly established statutory and constitutional
3 rights of which a reasonable person could have known.

4 21. Pursuant to FRCP 11, all possible affirmative defenses may not have been alleged
5 herein insofar as insufficient facts were available after reasonable inquiry upon the filing of
6 Plaintiff's First Amended Complaint, and therefore, Santos reserves the right to amend her Answer
7 to the First Amended Complaint to allege additional affirmative defenses if subsequent
8 investigation so warrants.

9 WHEREFORE, Santos prays for judgment as follows:

- 10 1. That Plaintiff takes nothing by virtue of her First Amended Complaint on file
11 herein, and that the same be dismissed with prejudice;
- 12 2. For an award of reasonable attorney's fees and costs of suit incurred in the defense
13 of this action;
- 14 3. For such other and further relief that this Court may deem just and proper in the
15 premises.

16 DATED this 28th day of May, 2025.

17 KAEMPFER CROWELL

18
19 By: /s/ Lyssa S. Anderson

20 LYSSA S. ANDERSON (Nevada Bar No. 5781)
KRISTOPHER J. KALKOWSKI (Nevada Bar No. 14892)
21 TRAVIS C. STUDDARD (Nevada Bar No. 16454)
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135

22 *Attorneys for Defendant*
23 *Angie Santos*
24

CERTIFICATE OF SERVICE

I certify that I am an employee of KAEMPFER CROWELL, and that on the date below, I caused the foregoing **DEFENDANT SANTOS' ANSWER TO FIRST AMENDED COMPLAINT [ECF No. 7]** to be served via CM/ECF and/or First Class Mail (where indicated) addressed to the following:

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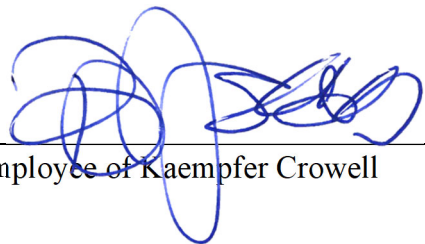
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Attorneys for Plaintiff

(Via U.S. Mail)

DATED this 28th day of May, 2025.

/s/ 
an employee of Kaempfer Crowell